

JACOBS & BARBONE, P.A.

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

1125 PACIFIC AVENUE
ATLANTIC CITY, NEW JERSEY 08401

PHONE: (609) 348-1125

FAX: (609) 348-3774

E-MAIL: JACOBSBARBONE@COMCAST.NET

EDWIN J. JACOBS, JR.

LOUIS M. BARBONE

ARTHUR J. MURRAY

MICHAEL F. MYERS

YOONIEH AHN

JOHN R. STEIN

January 15, 2015

SENT VIA ECF

Honorable Jerome B. Simandle
United States District Judge
United States District Court
Mitchell H. Cohen U.S. Court House
1 John F. Gerry Plaza, Room 6010
P.O. Box 888
Camden, N.J. 08101-0888

RE: U.S.A. v. Todd Reeves, et al.
Criminal No. 11-520 (JBS)
Our File No. 12,986

Dear Judge Simandle:

As directed in your Order dated January 7, 2015, Messrs. Furlong, Hughes and I have conferred regarding who will argue which common sentencing issues. Messrs. Kokes and McCann concur in the allocation, as follows:

- (a) Mr. Hughes will argue the downward departure/"heartland" issue, the loss calculation issue and restitution issue;
- (b) Mr. Furlong will argue the public health issue;
- (c) I will sparingly supplement some of the above.

Of course, all counsel will argue those issues personal to their clients along with their variance positions.

Respectfully,
JACOBS & BARBONE, P.A.

/s/ Edwin J. Jacobs, Jr.

Edwin J. Jacobs, Jr.

cc: Wayne Hettenbach, Esquire
cc: William J. Hughes, Jr., Esquire
cc: John Furlong, Esquire
cc: A. Harold Kokes, Esquire
cc: Kevin McCann, Esquire
cc: Todd Reeves